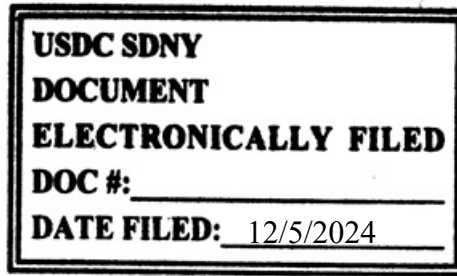


PAUL, WEISS, RIFKIND, WHARTON & GARRISON LLP

1285 AVENUE OF THE AMERICAS
NEW YORK, NEW YORK 10019-6064
TELEPHONE (212) 373-3000

DIRECT DIAL: (212) 373-3163
EMAIL: JAYCOHEN@PAULWEISS.COM

BEIJING
BRUSSELS
HONG KONG
LONDON
LOS ANGELES
SAN FRANCISCO
TOKYO
TORONTO
WASHINGTON, DC
WILMINGTON



December 4, 2024

VIA ECF AND EMAIL

The Honorable Katharine H. Parker
United States District Court
Southern District of New York
Daniel Patrick Moynihan Courthouse
500 Pearl Street, New York, NY 10007

APPLICATION GRANTED

Katharine H. Parker
Hon. Katharine H. Parker, U.S.M.J.

12/5/2024

Mechanical Licensing Collective v. Spotify USA Inc., No. 1:24-cv-03809

Dear Judge Parker:

In accordance with Your Honor's Order dated November 20, 2024 (Dkt. 49), the parties in the above-captioned action write jointly to propose the following amended schedule for remaining discovery.

After conferring, the parties agree that the following proposed amended schedule should afford sufficient time to resolve any outstanding discovery disputes, collect, review and produce responsive documents, conduct depositions, and conduct third-party discovery:

<u>Discovery Event</u>	<u>Current Deadline</u>	<u>Proposed New Deadline</u>
<u>Interrogatory Responses Due</u>	<u>December 4, 2024</u>	<u>December 11, 2024</u>
<u>Requests for Admission Due</u>	<u>December 6, 2024</u>	<u>February 28, 2025</u>
<u>Close of Fact Discovery</u>	<u>December 31, 2024</u>	<u>March 31, 2025</u>
<u>Initial Expert Reports Due</u>	<u>January 14, 2025</u>	<u>April 21, 2025</u>
<u>Rebuttal Reports Due</u>	<u>February 4, 2025</u>	<u>May 16, 2025</u>
<u>Close of Expert Discovery</u>	<u>February 14, 2025</u>	<u>June 6, 2025</u>

This is the second request for an extension of time to complete discovery.

Thank you for your time and consideration of this request.

PAUL, WEISS, RIFKIND, WHARTON & GARRISON LLP

2

Respectfully submitted,

**PAUL, WEISS, RIFKIND, WHARTON &
GARRISON LLP**

/s/ Jay Cohen

Jay Cohen

Darren W. Johnson

1285 Avenue of the Americas

New York, NY 10019-6064

Telephone: (212) 373-3000

jaycohen@paulweiss.com

djohnson@paulweiss.com

*Attorneys for Plaintiff Mechanical Licensing
Collective*

LATHAM & WATKINS LLP

/s/ Allison Levine Stillman

Allison Levine Stillman

1271 Avenue of the Americas

New York, NY 10020

Telephone: 212-906-1200

alli.stillman@lw.com

Sy Damle

555 Eleventh Street NW

Suite 1000

Washington, DC 20004

Telephone: 202-637 2200

sy.damle@lw.com

Attorneys for Defendant Spotify USA, Inc.